

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW COLE SMITH,

Defendant.

Case No. 3:16-cr-3048

DEFENDANT'S SECOND MOTION TO
EXTEND DEADLINE FOR FILING
AMENDED MOTION FOR
COMPASSIONATE RELEASE

COMES NOW the defendant, Andrew Cole Smith, through counsel, and moves to extend the deadline for filing his amended motion for compassionate release. In support of this motion, counsel states as follows:

1. Since October 2022, Mr. Smith has filed several *pro se* motion for compassionate release and supplements. (Docket No. 59-64, 66). On February 5, 2025, the Court entered an Order appointing the Federal Public Defender and setting an initial deadline by which to file an amended motion for compassionate release. (Docket No. 67). This is counsel's second request for an extension.

2. Counsel held a legal call with Mr. Smith on March 12, 2025, but the BOP limited its duration. Despite diligent efforts, another legal call has not yet been secured. Additional time is needed to complete investigation and to allow counsel and Mr. Smith further opportunity to confer regarding his motion.

3. AUSA Kraig Hamit has no objection to this motion.

WHEREFORE, the defendant, Mr. Smith, respectfully requests that the Court grant a two-month extension of the deadline for filing his amended motion for compassionate release to June 9, 2025.

Respectfully Submitted,

/s/ Nova D. Janssen

Nova D. Janssen, Asst. Federal Defender
FEDERAL PUBLIC DEFENDER'S OFFICE
400 Locust Street, Suite 340
Des Moines, Iowa 50309-2353
PHONE: (515) 309-9610
FAX: (515) 309-9625
E-MAIL: nova_janssen@fd.org
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2025, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

/s/ Natalie Gahan, Assistant Paralegal